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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.3.6.2: Draft Statement of Common Ground Cadent Gas Limited

**Final Issue A
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**The Infrastructure Planning (Examination Procedure) Rules 2010
Regulation 8(1)(k)**

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1. Introduction

- 1.1.1 This document supports National Grid Electricity Transmission plc's (here on referred to as National Grid) application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex.
- 1.1.2 A Statement of Common Ground (SoCG) is a written statement produced as part of the application for development consent and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning, and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.4 This SoCG is between National Grid Electricity Transmission Limited ('National Grid') and Cadent Gas Limited relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.5 This SoCG has been prepared to identify matters between National Grid and Cadent Gas Limited in respect to the Bramford to Twinstead reinforcement only. The SoCG will evolve as the application progresses through examination.

1.2 Description of The Project

- 1.2.1 This document supports National Grid's application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex. This would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km. The project meets the threshold as a NSIP, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.2.2 The reinforcement would comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.3 Four cable sealing end (CSE) compounds would be required to facilitate the transition between the overhead and underground cable technology. The CSE would be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.
- 1.2.4 Approximately 27km of existing overhead line and associated pylons would be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge

and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP substation would include associated works, including replacement pylons, a single circuit sealing end compound and underground cables to tie the substation into the existing 400kV and 132kV networks.

1.2.5 Some aspects of the project, such as the underground cable sections and the GSP substation, constitute 'associated development' under the Planning Act 2008.

1.2.6 Other ancillary activities would be required to facilitate construction and operation of the project, including (but not limited to):

- Modifications to, and realignment of sections of existing overhead lines, including pylons;
- Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;
- Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
- Diversion of third-party assets and land drainage from the construction and operational footprint; and
- Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid's commitments to Biodiversity Net Gain.

1.3 This Statement of Common Ground

1.3.1 For the purpose of this SoCG, National Grid and Cadent will jointly be referred to as the 'Parties'. When referencing Cadent Gas Limited alone, they will be referred to as 'the Consultee'.

1.3.2 Throughout the SoCG:

- Where a section begins 'Matters Agreed', this sets out matters that have been agreed between the Parties and where there is no dispute.
- Where a section begins 'Matters Not Agreed', this sets out matters that are not agreed between the Parties and where a difference of opinion remains.
- Where a section begins 'Matters Under Discussion', this sets out matters that are subject to further negotiation between the Parties.

1.3.3 This SoCG is structured as follows:

- Section 1 provides an introduction to this SoCG and a description of its purpose.
- Section 2 states the role of the Consultee in the DCO application process and details engagement undertaken between the Parties.
- Section 3 sets out matters agreed between the Parties.
- Section 4 sets out matters not agreed between the Parties.

- Section 5 sets out matters where agreement is currently outstanding between the Parties, but is under discussion.
- Section 6 includes the signing off sheet.

2. Record of Engagement

2.1 Role of the Consultee in the process

- 2.1.1 The Consultee is a Statutory Undertaker under the Gas Act 1986. The Consultee holds a licence as the gas distribution operator for the relevant area. It has a number of assets within the proposed Order Limits.
- 2.1.2 National Grid has consulted with the Consultee in its capacity as a prescribed consultee for the purposes of the project.
- 2.1.3 The Consultee has two high pressure pipelines and other assets that are within the proposed Order Limits of the project. These assets do not interface with any underground cabling, only haul roads, bellmouths and areas of biodiversity net gain. In addition, planned overhead line works are proposed in close proximity to the high-pressure pipelines.

2.2 Summary of pre-application discussions

- 2.2.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 – Pre-application discussions

Date	Topic	Discussion Points
13 March 2021	Non-statutory Consultation	National Grid wrote to the Consultee as they are a prescribed consultee in the DCO process, informing them of the start of the non-statutory consultation and inviting their views. A response was received from the Consultee on 14 April 2021 stating the Consultee has a number of pipelines and associated apparatus located within the Order limits and will require appropriate protection including compliance with relevant standards for works proposed within close proximity of its apparatus.
19 January 2022	Statutory Consultation	National Grid wrote to the Consultee as they are a prescribed consultee in the DCO process, informing them of the start of the statutory consultation and inviting their views. A response was received from the Consultee on 18 March 2022 outlining their current position.
28 September 2022	Planned works enquiry	The Consultee requested National Grid to complete a planned works enquiry.
23 January 2023	Planned works enquiry	The Consultee requested a site visit to identify interfaces of its assets with the project after assessment of the planned works enquiry. After further discussions, it was decided that this would not be required.

2.3 Summary of post-submission discussions

2.3.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application for development consent.

Table 2.2 – Post-submission discussions

Date	Topic	Discussion Points
1 June 2023	Project update and affected apparatus	National Grid emailed the Consultee to give a brief overview of the project and shared plans of where the Consultee assets interface the project to re-establish contact.
6 June 2023	Notification of Relevant Representation	National Grid wrote to the Consultee to inform them that the application for Development Consent had been accepted and that relevant representations could be submitted.
18 July 2023	Relevant Representation	<p>The Consultee submitted a relevant representation to the planning inspectorate [RR-024] key points included:</p> <ul style="list-style-type: none"> • form of protective provisions to be included in the draft Development Consent Order (DCO); • land rights being obtained should <u>the Consultee</u> need to divert their assets due to the project; and • access to the Consultee assets so they may complete inspections, maintenance and repair works. <p>National Grid's response to the Consultee's Relevant Representation is included in the Applicant's Comments on Relevant Representations document (document 8.3.3).</p>
1 August 2023	Virtual meeting	<p>National Grid Introduced the planned works for the project and the timescales for these works. The Consultee Shared plans of where the Consultee's assets interface with the project.</p> <p>It was agreed the Consultee assets do not interface with the underground cabling of the project, but there are multiple interfaces with haul roads and bellmouths.</p> <p>A verbal agreement was made for the hierarchy of measures to manage construction interfaces (this is outlined in the Matters Agreed section below).</p>
1 August 2023	Protective Provisions request	National Grid emailed Cadent notifying them that general Protective Provisions have been included in the DCO for the benefit of electricity and gas undertakers, but there are no protective provisions currently included in the DCO for the specific benefit of Cadent. National Grid requested that Cadent provide the protective provisions they wish to include, no response has been received as yet.
14 August 2023	High Pressure Pipeline easement	Following discussions from the virtual meeting, the Consultee confirmed that the two high pressure pipelines that interface with the project have a 6m easement strip on either side of the pipeline. The Consultee has requested that any pylons forming part of the overhead line are constructed outside of this easement strip. National Grid has confirmed this can be accommodated.
16 August 2023	Protective Provisions update	National Grid emailed Cadent to follow up on the protective provisions for their specific benefit that they wish to include in the DCO, no response has been received.

3. Matters Agreed

Table 3.1 – Matters agreed

SoCG ID	Matter	Agreed position	Date agreed
3.1 Hierarchy of measures to manage construction interfaces			
3.1.1	High Pressure Pipeline easement	The Consultee has confirmed two high pressure pipelines that interface with the project have a 6m easement strip on either side of the pipeline. The Consultee has requested that any pylons forming part of the overhead line are constructed outside of this easement strip. National Grid has confirmed this can be accommodated.	14 August 2023
3.1.2	Haul roads and bellmouths	Where the Consultee Gas assets interface with the haul roads/bellmouths of the project, they will be protected in situ. This will be done by following the 'Specification for Safe Working in the vicinity of the Consultee Assets' document that has been provided. For any vehicles over 13 tons, surface load calculations will be required, and a report generated to determine if any protection measures will need to be installed at these interfaces. This may include free standing bridges, propriety access roads and haul roads including hardcore, sleepers (bog mats), steel plates or a combination of these. Considering a worst-case scenario, the Consultee Gas assets will need to be diverted, this decision would be reached after exploring all other alternatives.	14 September 2023
3.1.3	Biodiversity Net Gain (BNG) areas	Where the Consultee Gas assets interface with the areas of BNG on the project, these areas will be designed to the Consultee Gas constraints by following the 'Specification for Safe Working in the vicinity of the Consultee Assets' document that has been provided.	14 September 2023

4. Matters Not Agreed

4.1.1 No matters not agreed.

5. Matters Under Discussion

Table 5.1 – Matters under discussion

SoCG ID	Matter	The Consultee position	National Grid position
5.1 The project and Cadent Gas Assets			
5.1.1	There is an interface between the project and Cadent assets	<p>The draft DCO [APP-034] includes (at Part 1 of Schedule 14) general protective provisions for the benefit of gas undertakers (amongst others).</p> <p>The Consultee has indicated in its Relevant Representation that these protective provisions do not adequately protect its statutory undertaking.</p> <p>National Grid and the Consultee remain in discussion as to the form of protective provisions to be included in the draft Development Consent Order.</p>	<p>The draft Development Consent Order [APP-034] includes (at Part 1 of Schedule 14) general protective provisions for the benefit of gas undertakers (amongst others).</p> <p>National Grid is yet to receive proposed protective provisions from the Consultee so is currently unable to comment on whether it believes the existing protective provisions are sufficient.</p>

6. Approvals

Signed

On Behalf of

National Grid

Name

Position

Date

Signed

On Behalf of

The Consultee

Name

Position

Date

Reference List

Department for Communities and Local Government (2015) *Planning Act 2008: Guidance for the examination of applications for development consent*. March 2015 (Department for Communities and Local Government, 2015)

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